

## REMARKS

### *Status of the Claims*

Claims 1, 4-7, 10-17 and 26-30 are pending, with Claims 1, 15 and 28 being independent. Claims 10-14 have previously been withdrawn from consideration. Claims 1, 15, and 28 have been amended. Support for the claim changes can be found in the original disclosure, for example, in Figure 7, and the accompanying description in the specification, and therefore no new matter has been added.

### *Requested Action*

Applicant respectfully requests the Examiner to reconsider and withdraw the outstanding rejections in view of the foregoing amendments and the following remarks.

### *Claim Rejections*

Claims 1, 7, 15, 17 and 26-30 have been rejected under 35 U.S.C. § 102(b) as allegedly being unpatentable over U.S. Patent No. 5,987,179 (Rick et al.). Claims 4-6 and 16 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Rick et al. in view of Japanese Patent Application Publication 2000-050263 (Asada et al.).

In response, while not conceding the propriety of the rejections, independent Claims 1, 15, and 28 have been amended. Applicant submits that as amended, these claims are allowable for the following reasons.

Claim 1 relates to an image processing apparatus for encoding input motion-image data by using intra-frame coding and inter-frame coding, and encoding input still-image data as pictures for a predetermined period of time by using the same encoding method as the encoding

method of the motion-image data. The apparatus comprises a control-signal receiving unit, a still-image-recording control circuit, a still-image-data memory unit, a circuit having a switch, a quantization unit, a control unit, and an encoder unit. The control-signal receiving unit is configured to receive a still-image-recording control signal indicating that still-image recording rather than motion-image recording is to occur. The still-image-recording control circuit controls actuation of still-image recording in response to receipt of a still-image-recording control signal by the control-signal receiving unit. The still-image-data memory unit is configured to store received still-image data in response to an instruction from the still-image-recording control circuit and to continuously output the stored input still-image data during a predetermined period. The circuit having the switch is controlled to provide the still-image data continuously received from the still-image-data memory unit in place of the motion-image data, in response to the instruction from the still-image-recording control circuit. The quantization unit is configured to quantize still-image data and motion-image data received from the circuit. The control unit is configured to control a quantization method in the quantization unit so that a quantization step becomes smaller than a quantization step for motion-image data when still-image data stored in the still-image-data memory unit is quantized. The encoding unit is configured to generate intra-frame coded data and inter-frame coded data from still-image data quantized by the quantization unit, and generate from one still image, a plurality of groups of pictures in which each group of pictures includes the intra-frame coded data and a plurality of the inter-frame coded data. In addition, the encoding unit generates the inter-frame coded data, which includes bi-directionally predictive frames, by encoding a difference between the input still-image data and predicted data converted from the generated intra-frame coded data and inter-frame coded

data previously, and sets a start group of pictures among the generated plurality of groups of pictures as a closed group of pictures.

Claim 1 has been amended to recite a resolution converting circuit configured to receive motion-image data and still-image data, to convert the resolution of the received motion-image data, and to refrain from converting the resolution of the received still-image data. Claim 1 has also been amended to recite that the still-image-recording control circuit controls actuation of the resolution converting circuit so as to cause the resolution converting circuit to refrain from converting the resolution of the received still-image data.

By this arrangement, the original resolution of still-image data can be maintained when it is recorded even when the resolution of motion-image data is reduced, and the increased amount of coding experienced with still image recording can be compensated for, at least to some extent, by high-efficiency coding of the B-pictures and P-pictures, as discussed in paragraph [0069] of the published version of the application, U.S. Patent Publication No. 2004/0101051.

In contrast, the citation to Rick et al. is not understood to disclose or suggest a resolution converting circuit configured to receive motion-image data and still-image data, to convert the resolution of the received motion-image data, and to refrain from converting the resolution of the received still-image data, and a still-image-recording control circuit controlling actuation of the resolution converting circuit so as to cause the resolution converting circuit to refrain from converting the resolution of the received still-image data, as recited by amended Claim 1.

Therefore, Applicant submits that amended Claim 1 is not anticipated by the Rick et al. patent. As a result, Applicant respectfully requests that the rejection of amended Claim 1 be withdrawn.

And since independent Claims 15 and 28 have been amended in a similar manner, they are submitted to be allowable for similar reasons. Therefore, Applicant respectfully requests that the rejection of Claims 15 and 28 be withdrawn.

The dependent claims are also submitted to be patentable, due to their dependency from the independent base claims, as well as due to additional features that are recited. Individual consideration of the dependent claims is respectfully solicited.

### *Conclusion*

In view of the above amendments and remarks, the application is now in allowable form. Therefore, early passage to issue is respectfully solicited.

Any fee required in connection with this paper should be charged to Deposit Account No. 06-1205.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

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